

EXHIBIT C



From: Kate Swift kate.swift@bartlit-beck.com
Subject: RE: In RE: MDL 2804 - Accelerated 30b6 on Document Preservation
Date: September 11, 2018 at 1:16 PM
To: Jeff Gaddy jgaddy@levinlaw.com
Cc: Peter Mougey pmougey@levinlaw.com, Laura Dunning ldunning@levinlaw.com, Page Poerschke ppoerschke@levinlaw.com, Becca Timmons btimmons@levinlaw.com, Haynes Bryant hbryant@levinlaw.com, Hunter Shkolnik Hunter@NapoliLaw.com, Salvatore C. Badala SBadala@NapoliLaw.com, Joseph L. Ciaccio JCiaccio@NapoliLaw.com, Josh Gay jgay@levinlaw.com, ADressel@NapoliLaw.com, Katie Mayo kmayo@levinlaw.com, Kaspar Stoffelmayer kaspar.stoffelmayer@bartlit-beck.com

Jeff,

We are not going to offer a witness for an accelerated 30(b)(6) deposition. The claims in your Friday letter are baseless, and the discovery you seek is inappropriate. We have explained this, both in our meet and confer and in our written correspondence. It is clear that we will not reach agreement on this issue. We will seek Special Master Cohen's intervention today.

Katherine M. Swift | Bartlit Beck Herman Palenchar & Scott LLP

[54 West Hubbard Street, Suite 300, Chicago, IL 60654](#)

P: [312.494.4405](tel:312.494.4405) F: [312.494.4440](tel:312.494.4440) C: [773.531.6118](tel:773.531.6118)

kate.swift@bbhps.com | www.bartlit-beck.com

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From: Katie Mayo <kmayo@levinlaw.com>
Sent: Friday, September 7, 2018 4:50 PM
To: Kate Swift <kate.swift@bartlit-beck.com>; Kaspar Stoffelmayer <kaspar.stoffelmayer@bartlit-beck.com>
Cc: Peter Mougey <pmougey@levinlaw.com>; Laura Dunning <ldunning@levinlaw.com>; Page Poerschke <ppoerschke@levinlaw.com>; Becca Timmons <btimmons@levinlaw.com>; Haynes Bryant <hbryant@levinlaw.com>; Hunter Shkolnik <Hunter@NapoliLaw.com>; Salvatore C. Badala <SBadala@NapoliLaw.com>; Joseph L. Ciaccio <JCiaccio@NapoliLaw.com>; Josh Gay <jgay@levinlaw.com>; ADressel@NapoliLaw.com; Jeff Gaddy <jgaddy@levinlaw.com>
Subject: In RE: MDL 2804 - Accelerated 30b6 on Document Preservation

Counsel,

On behalf of Jeff, please see the attached correspondence.

Thank you,

Katie Mayo

Assistant to Jeff Gaddy and Alex Taylor
Levin, Papantonio, Thomas, Mitchell,
Rafferty & Proctor, P.A.
316 S. Baylen Street, Suite 600
Pensacola, FL 32502-5996
850.435.7182 (office)
850.436.6182 (fax)
kmayo@levinlaw.com

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